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Dear Planning Policy Manager

Draft Rother Local Plan (Regulation 18) – National Highways’ response

Thank you for your email of 26 January 2026 consulting National Highways on the draft Rother Local Plan 2025-2042 – Development Strategy and Site Allocations (the draft Plan).

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN). In the case of Rother district, the SRN comprises the A259 and the A21.

We have read the consultation document and understand that the focus is on the proposed site allocations. We have also read the Local Development Scheme (LDS) (March 2025) which maps out the timetable for the production of the Local Plan.

We have set out below our comments.

SRN policy context – vision-led approach

We would like to draw your attention to the Department for Transport (DfT) [Circular 01/2022: Strategic road network and the delivery of sustainable development \(December 2022\)](#) which represents the government’s policy for the SRN.

Plan-making needs to respond to the expectations of this policy including a **vision-led approach** to development. The objective of vision-led development is to manage down traffic impacts by maximising opportunities for sustainable travel and by internalising movements as far as possible through layout and design. There is also a specific section in the Circular on ‘Engagement with plan-making’.

The vision-led approach to development now features in the updated [National Planning Policy Framework \(NPPF\) \(December 2024\)](#) – please see section 9. The updated NPPF also includes a requirement for Local Plans to look ahead over a minimum 15-year period from adoption. It is important to highlight this at this early stage because the time horizon for the Local Plan is relevant to the evidence that needs to be prepared to inform plan-making.

A key part of the vision-led approach, where appropriate, is **monitor and manage**. This is an important strategy for overseeing the appropriateness and phasing of identified highway mitigation to support the delivery of large developments. This would need to be informed by an **Infrastructure Delivery Plan** that should be kept live by regular monitoring during the implementation of the development strategy for the Local Plan.

We are happy to work with you on the development of appropriate policies that address the vision-led approach and monitor and manage.

Rother Local Plan 2025-2042 – Development Strategy and Site Allocations Draft (Regulation 18) Version, January 2026

The draft Local Plan sets out proposed site allocations across the district along with some area specific policies.

We understand that ‘Additional technical evidence will be prepared to ensure the potential impacts (including cumulative impacts) of the level of growth planned in Rother is appropriately considered, as well as to ensure new development is suitably located and can be adequately supported by infrastructure, and is viable, in line with national policy and guidance.’

We would encourage Rother District Council (RDC) to continue to engage with us in respect of the transport modelling and assessments in order to ensure that the approach is consistent with the guidance set out in DfT Circular 01/2022.

Furthermore, we suggest that the Local Plan considers cumulative impacts of development in neighbouring authorities. This is in line with DfT Circular 01/2022 paragraph 29 and the NPPF on strategic cross-boundary matters.

Infrastructure Needs

We note that an updated Draft Infrastructure Delivery Plan (IDP) has been prepared in support of this Regulation 18 consultation and our comments on this document are detailed within a later section of this letter.

However, it is also important to note that we understand the draft IDP will require further revisions once the updated strategic transport modelling using the countywide model is

complete. As such, the infrastructure needed to support the delivery of the Local Plan cannot be fully identified until this work is complete.

Development Strategy

We note that following the first Regulation 18 consultation, several additional options for the development strategy have been identified, these included the 'A21 Corridor Option'.

We note that this option would have the most direct implications for the SRN. This option provides for development along the A21 trunk road within an identified corridor of settlements, together with a sustainable transport corridor (including improved sustainable travel options such as bus routes, cycling and walking infrastructure).

We would highlight that any proposed changes/improvements to any part of the SRN will require consultation with and approval from us.

Furthermore, the full impact of this option is required to be assessed as part of the updated modelling, to be undertaken in compliance with the guidance set out in DfT Circular 01/2022.

We strongly advise that RDC continue to engage with us regarding the updated modelling and preparation of the associated transport evidence base documents to ensure that any potential impacts on the SRN are appropriately assessed.

Development Strategy for Rother

It is noted that Bexhill will be the key focus for sustainable residential and commercial growth with potential to deliver circa 4,764 dwellings and 54,672 sqm. of employment.

It is evident that the proposed development strategy will place additional strain on the SRN in this area and this will need to be fully assessed through the updated modelling work being undertaken to support the draft Local Plan.

RDC must consider Circular 01/2022 paragraph 29:

'... there cannot be any presumption that such infrastructure will be funded through a future RIS [Road Investment Strategy]. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.'

The draft Local Plan notes there are 'opportunities for sensitive development in the sub-area during the timeframe of the Local Plan, where sustainable and related to an existing settlement, including those alongside the A21. Longer term (beyond the timeframe of the

new Local Plan), the delivery of significant improvements to create a sustainable transport corridor could open up opportunities for future development along the A21 corridor, which could be addressed in a plan review.'

RDC states that there is potential to deliver 996 dwellings and 4,350 sqm of employment floorspace across the Northern Rother sub-area.

Paragraph 6.85 of the draft Local Plan states:

'The A21 provides road connections between the villages north and south. In the long-term, the A21 could become a sustainable travel corridor with buses given priority, linked to walking, cycling and wheeling routes. The Transport for the South-East (TfSE) Strategic Investment Plan identifies bypasses on the A21 at Flimwell and Hurst Green as necessary transport interventions to decarbonise transport in the south-east by 2050. However, these are not currently funded and there is a lack of evidence they will come forward at any point, including during the timescale of the Local Plan.'

Introducing a sustainable travel corridor along the A21 aligns with DfT Circular 01/2022 policy by encouraging walking, wheeling, cycling and public transport use as the natural first choice. However, we would again reiterate that the need for any SRN mitigation must be considered after all options have been assessed to maximise the accessibility by sustainable transport modes. There cannot be any presumption that SRN-related infrastructure to mitigate Local Plan impacts will be funded through a future government's Road Investment Strategy (RIS). Funding and delivery of necessary SRN infrastructure to support planned growth is a matter for the Local Planning Authority (LPA) to lead on through the Local Plan process.

Furthermore, it is also important to note that while RIS3 has yet to be published, the [interim statement \(2025/2026\)](#) highlights that RIS3 will be focused on maintenance and renewal (para.4.3):

'While RIS3 has yet to be agreed, it is likely that investment will be increasingly focussed on maintaining and renewing the existing Strategic Road Network, including replacing and renewing major bridges, viaducts and other structures.'

Site Allocations

We note that there are circa 162 site allocation policies (some are area specific and can also encompass more than one site).

Our review has sought to identify immediately apparent site-specific matters of interest to us, which are:

- Sites which would require a new access onto the SRN (this includes sites that do not abut the SRN but would require a new access onto the SRN as part of their wider transport strategy)
- Sites which propose to use an existing SRN access
- Sites which abut the SRN but would take access onto the Local Road Network
- Sites located near the SRN.

Sites requiring a new access onto SRN

All sites seeking a new access onto the SRN must demonstrate evidence of:

- Policy compliance regarding new accesses on the SRN as per DfT Circular 01/2022, in particular paragraphs 18 to 25
- Design Manual for Roads and Bridges (DMRB) compliance and Stage 1 Road Safety Audit (RSA), Walking, Cycling and Horse-riding Assessment and Review (WCHAR) etc.

In relation to policy compliance, we would highlight paragraph 19 of the Circular (our emphasis):

'19. On this basis the principle of creating new connections on the SRN should be identified at the plan-making stage in circumstances where an assessment of the potential impacts on the SRN can be considered alongside whether such new infrastructure is essential for the delivery of strategic growth. Moreover, the company will need to be satisfied that all reasonable options to deliver modal shift, promote walking, wheeling and cycling, public transport and shared travel to assist in reducing car dependency, and locate development in areas of high accessibility by sustainable transport modes (or areas that can be made more accessible) have been exhausted before considering options for new connections to the SRN. There may also be limited opportunity for new connections to be considered as part of public funding programmes to support new development, although necessary infrastructure in up-to-date plans and strategies should be favoured in such instances.'

We would therefore expect an appropriate assessment to be undertaken and included - either within the Local Plan transport evidence or as part of the explanation of the development strategy – demonstrating how this has been addressed through plan-making by RDC. It may be the case that it can be drawn from other existing sources that form part of the Local Plan evidence base.

It is important that RDC demonstrates that they have followed this process as any new connections on the SRN can create additional risk to safety and reduce the reliability and efficiency of journeys.

In respect of these sites, it is also strongly advised that individual site-specific advice be sought from us as soon as possible.

Sites proposing to utilise an existing SRN access

All sites which propose to utilise an existing SRN access will need to fully assess any impacts arising from the proposed development traffic.

It is important to note that we would not support the intensification of use of an existing SRN access where there would be a detrimental impact on safety.

Any proposed upgrade/improvement of an existing SRN access would need to be fully assessed in line with the relevant guidance set out in DfT Circular 01/2022 and DMRB.

For all sites where SRN access is critical to the deliverability of the development, the required assessments should be undertaken as soon as possible, in advance of the Regulation 19 submission.

Sites which abut the SRN

All sites which abut the SRN will need to consider any boundary issues, eg drainage, lighting, geotechnical, boundary treatments, in consultation with us.

Sites near the SRN

For sites located near to the SRN, it will be particularly important that they are supported by an appropriate Transport Assessment at the planning application stage and are advised to seek early engagement with us at the pre-application stage. However, this does not preclude the need for Transport Assessments for sites which are located further away which are of a development quantum which could have a material traffic impact on the SRN.

We note that the cumulative traffic impact of all proposed site allocations is to be assessed as part of the updated modelling based on the East Sussex Countywide model.

Evidence-base: Strategic transport modelling

It is important that plan-making is informed by proportionate up-to-date evidence.

In respect of transport, we expect the beginning stages of plan-making to be supported by baseline evidence for the highway networks across Rother District, with our focus being on the SRN. We note that the transport evidence which has been published as part of the

current consultation dates from 2023 and therefore is not able to specifically consider the impacts of the specific sites identified in the main Regulation 18 consultation document.

We understand that the intention is to utilise the East Sussex Countywide Transport Model (ESCWTM/ 'countywide model') in advance of subsequent consultation stages to '*underpin and develop a detailed Shared Transport Evidence Base*'.

This needs to set out current and future baseline (end of plan period + extant permissions) information on the performance of junctions across the highway networks. We understand that this will be informed by updated transport modelling using the Countywide strategic model.

Baseline information on the current and expected performance of junctions across the highway networks (without the emerging Local Plan) is relevant to the site selection process and needs to be produced in advance of the detailed Regulation 19 Local Plan to inform its preparation.

We are happy to be engaged with the scoping, calibration, and validation of this work, along with colleagues at East Sussex County Council who are responsible for the Local Road Network (LRN).

Once established, the strategic transport model can then be used to test development strategy options being considered by the council for the Local Plan.

Evidence base: Infrastructure Delivery Plan (IDP) January 2026

The IDP is a useful piece of evidence to identify what, where and when in terms of the infrastructure needed to support the development strategy in the Local Plan. It can identify schemes, estimated costs, and when the mitigation will be phased alongside the build-out of the development strategy.

We have reviewed the IDP Part A and Part B (The Schedule) and would note the following points:

Strategic Corridor Improvements

The A21 and A259 corridors have been identified as requiring capacity management and selective enhancements to accommodate forecast growth. The IDP confirms that any improvements along this corridor should be aligned with National Highways' RIS3 (2026 – 2031), and the LTP4 Investment Plan priorities. We would note that RIS3 is yet to be published, however, the outlined approach would be acceptable in principle. It is important to appreciate that the focus of RIS3 will be on maintenance and renewal; there is uncertainty about the future of RIS3 pipeline projects identified in RIS2. The current position on the A21 Safety Package scheme is available from our website:

<https://nationalhighways.co.uk/our-roads/south-east/a21-safety-package/>

Integration with multi-modal travel

We welcome the statement in Paragraph 3.40 of the IDP which outlines that road interventions must support sustainable travel choices, with new and upgraded infrastructure planning alongside priority measures, cycle lanes, and pedestrian infrastructure. Such improvements should be designed in accordance with appropriate DMRB standards with any proposals submitted to us for approval.

Phased delivery and prioritisation

We agree that road network improvements should be phased in line with housing and employment delivery to ensure new capacity and infrastructure is in place at the right time as development comes forward.

Financial & delivery requirements

It should be noted that any improvement schemes on the SRN would be expected to be delivered via a s.278 (Highways Act 1980) agreement between the developer and National Highways. We do not accept developer contributions, with priorities for the SRN set in the government's RIS.

It is also important to note that RIS3 has yet to be published and as such there should be no reliance on any schemes that may be included within it. As highlighted above, there is uncertainty about RIS3 pipeline projects identified in RIS2.

We would also highlight paragraph 29 of DfT Circular 01/2022 (our emphasis):

'New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.'

We welcome the reference to the 'vision and validate' approach (also known as 'monitor and manage') in Paragraph 10.9 of the IDP.

We consider that it could be beneficial to discuss the suitability of a 'Monitor and Manage' approach for individual proposed developments on a case-by-case basis at the appropriate

time during the planning process, as part of a collaborative approach involving us, the LPA, developers and ESCC.

The IDP Part B (the Schedule) lists a number of schemes which directly impact the SRN.

We note that we have been identified as a *'Delivery Partner'* for some of these schemes. As previously noted, Paragraph 10.21 of the IDP states that a *'Delivery Partner'* is defined as: *'any strategic stakeholder (public or private) involved in the planning, design, technical approval, or funding of infrastructure; they are not necessarily the body that directly delivers the infrastructure itself.'*

Based on RDC's definition, we would be a *'Delivery Partner'* for all schemes on the SRN as technical approval from us would be required. Any proposed changes to the layout or operation of the SRN will need to be approved by us, with the changes designed in accordance with appropriate DMRB standards and assessed in compliance with DfT Circular 01/2022.

For the avoidance of doubt, unless otherwise specified by us, any identified SRN schemes necessary to support planned growth will not be funded or delivered by National Highways.

With regard to the Schedule itself, it would be useful to have additional information presented in relation to the presented schemes, where applicable, particularly for those classified as critical or essential:

- Scheme drawing number reference
- LPA planning application reference(s) if scheme is linked/conditioned to development(s)
- Any identified trigger points (development thresholds) at which scheme is required.

We have not undertaken a detailed review of all SRN schemes included within the Schedule as we understand that the transport modelling evidence for the draft Local Plan, based on the latest site allocations, may result in changes to infrastructure requirements. As such, we anticipate that there will need to be a further update to the IDP once the modelling is completed. We have no further comments at this stage.

National Highways will need to participate in discussions involving East Sussex County Council (ESCC) and RDC, to ensure that the agreed modelling scope, specifications, and assumptions are appropriate and proportionate to the needs of the emerging Local Plan.

The IDP is a useful piece of evidence for documenting the outputs from the monitor and manage strategy which needs to form part of the implementation of the Plan. It would benefit from a chart plotting the phasing of essential transport infrastructure alongside the build-out

of the development strategy to ensure identified mitigation is delivered at the right time in the development cycle. We are happy to be engaged with the development of further updates to the IDP and the monitor and manage strategy.

Expectation management

We must be clear that the funding and delivery of mitigation to the SRN that is necessary to support the development strategy in the Local Plan are matters for the LPA to decide and manage through the Local Plan process, including during its implementation.

Priorities for investment in the SRN are set in the government's Road Investment Strategy (RIS). There cannot be a presumption that improvements to the SRN necessary to support planned growth in the Local Plan will be funded and supported through a future RIS. RIS3 (2026-2031) will be focused on maintenance and renewal.

We are happy to be engaged in the process of assessing proposed mitigation, e.g. safety and design standards, but will not be responsible for funding or delivery.

Keep informed

We hope these comments are clear and helpful. We are happy to work with Rother District Council on an on-going basis as the Local Plan, including the evidence base, progresses.

Please keep us informed about the development of transport related evidence and the next stage of the Draft Rother Local Plan. Please ensure your mailing list has the following details for National Highways: planningse@nationalhighways.co.uk

We would also like to share with you our '[Planning for the future – A guide to working with National Highways on planning matters](#)' (October 2023), which is available from our website. This planning guide describes the approach we take to engaging with the planning system and the issues we look at when considering draft planning documents such as Local Plans.

We have also prepared a **short explainer video outlining how we engage with planning**. This video is available from our website under the heading 'Our support for plan-making and decision-taking': <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>. In addition, we have prepared a Local Plan brochure outlining how we engage with plan-making which is available from the same section of our website.

Should you or any others have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.

Yours faithfully,



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